

1 H. GRANT LAW (SBN: 144505)
2 hlaw@shb.com
3 AMIR NASSIHI (SBN: 235936)
4 anassih@shb.com
5 SHOOK, HARDY & BACON L.L.P.
6 333 Bush Street, Suite 600
7 San Francisco, California 94104-2828
8 Telephone: 415.544.1900
9 Facsimile: 415.391.0281

10 Attorneys for Defendant
11 FORD MOTOR COMPANY

12 DANIEL DELL'OSO (SBN: 118203)
13 ddo@brandilaw.com
14 LAW OFFICES OF THOMAS J. BRANDI
15 354 Pine Street, Third Floor
16 San Francisco, CA 94104
17 Telephone: 415.989.1800
18 Facsimile: 415.989.1801

19 Kevin F. Quinn, Esq. (SBN: 106224)
20 quinn@tbmlawyers.com
21 TORNSNES BARTOLOTTA MCGUIRE
22 2550 Fifth Avenue, Suite 1100
23 San Diego, CA 92103
24 Telephone: 619.236.9363
Facsimile: 619.236.9653

25 Attorney for Plaintiff
26 DAX PIERSON

27 UNITED STATES DISTRICT COURT
28 NORTHERN DISTRICT OF CALIFORNIA

29 DAX PIERSON,) Case No. CV-06-06503 PJH
30 Plaintiff,)
31 vs.) **JOINT MOTION AND STIPULATION TO**
32 FORD MOTOR COMPANY,) **STAY JUDGMENT; [PROPOSED] ORDER**
33 Defendant.)
34 _____)

35 Plaintiff Dax Pierson and Defendant Ford Motor Company have met and conferred with
36 respect to staying the judgment and execution or enforcement thereof, pending conclusion of post-
37 trial and appellate proceedings in this matter. Although Fed. R. Civ. Proc. Rule 62(a)'s 10 day stay
38

1 after entry of judgment falls on September 1, 2009, Parties have agreed that Ford may post its bond
2 of \$15,227,000, by September 4, 2009. The judgment and execution or enforcement thereof are
3 stayed until the conclusion of post-trial and appellate proceedings in this matter, as if Ford's bond
4 was approved by this Court before September 1, 2009.

5
6 Date: August 25, 2009

Respectfully Submitted,

7
8 SHOOK, HARDY & BACON, L.L.P.
9
10 By: /s/ H. Grant Law
11 H. GRANT LAW
12 Attorney for Defendant
13 FORD MOTOR COMPANY
14
15
16
17 THE BRANDI LAW FIRM.
18 By: /s/ Kevin F. Quinn
19 KEVIN F. QUINN,
20 Attorney for Plaintiff
21 DAX PIERSON
22
23 [PROPOSED] ORDER
24 Pursuant to stipulation, the Court hereby orders the following:
25 Enforcement or execution of the judgment in this matter are hereby stayed pending
26 conclusion of post-trial and appellate proceedings, subject to Ford posting its bond by September 4,
27 2009.
28
IT IS SO ORDERED.
DATED: 8/26/09

